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7 *Attorneys for Defendants*  
Charles Daniels, Brian Williams,  
Tim R. Garrett, Kirk R. Widmar,  
Bobby K. Preston, Jason C. Chacon,  
and Tyler Randall  
10

11 UNITED STATES DISTRICT COURT  
12 DISTRICT OF NEVADA

13 AJA GORSLINE,

Case No. 3:21-cv-00019-ART-CLB

14 Plaintiff,

15 vs.

16 CHARLES DANIELS, Director of the  
Nevada Department of Corrections ("NDC")  
in his individual capacity; BRIAN  
WILLIAMS, Deputy Director of Operations;  
18 TIM R. GARRETT, Acting Warden and  
Associate Warden of the Lovelock  
Correctional Center ("LCC"); KIRK R.  
WIDMAR, Acting Associate Warden and  
20 Correctional Lieutenant of the LCC; BOBBY  
K. PRESTON, Correctional Lieutenant of  
the LCC; JASON C. CHACON, Shift  
Commander of the LCC; Tyler Randall,  
22 Correctional Officer previously identified as  
John Doe Corrections Officer; JOHN  
AND/OR JANE DOE CAPTAIN; JOHN  
AND/OR JANE DOE LIEUTENANT; JOHN  
24 AND/OR JANE DOE SERGEANT; JOHN  
AND/OR JANE DOES CORRECTIONS  
25 OFFICERS; JOHN AND JANE DOES 1 –  
40,

**STIPULATION TO EXTEND TIME  
TO RESPOND TO PLAINTIFF'S  
SECOND AMENDED COMPLAINT  
AND TO SET BRIEFING SCHEDULE  
(First Request)**

26 Defendants.  
27

1 IT IS HEREBY STIPULATED between Plaintiff Aja Gorsline (“Plaintiff”) and  
2 defendants Charles Daniels, Brian Williams, Tim R. Garrett, Kirk R. Widmar, Bobby K.  
3 Preston, Jason C. Chacon, and Tyler Randall (collectively “Defendants”), by and through  
4 their undersigned counsel of record, and pursuant to LR IA 6-1, as follows:

- 5 1. This is the first stipulation and for extension of time to respond to Plaintiff’s  
6 second amended complaint (“SAC”).
- 7 2. Plaintiff filed her SAC on March 30, 2022.
- 8 3. The SAC adds a new defendant, Tyler Randall.
- 9 4. Plaintiff has not yet served Tyler Randall.
- 10 5. Tyler Randall’s response to the SAC is not yet due.
- 11 6. The last day for the remaining Defendants to respond to Plaintiff’s SAC is  
12 April 13, 2022.
- 13 7. On April 12, 2022, Defendants’ counsel was retained and authorized to accept  
14 service on behalf of Tyler Randall.
- 15 8. To avoid duplicate briefing on the SAC, the parties agree to the following  
16 briefing schedule that will apply to all Defendants:
  - 17 a. Last day for Defendants to file a motion to dismiss the SAC: Friday, May  
18 27, 2022

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- 1           b. Last day for Plaintiff to file her opposition: Friday, June 10, 2022  
2           c. Last day for Defendants to file their reply: Friday, June 17, 2022

3 DATED this 13th day of April, 2022.

DATED this 13th day of April, 2022.

4 AARON D. FORD  
5 Attorney General

6 By: /s/ Akke Levin

7 Steve Shevorski (Bar No. 8256)  
8 Chief Litigation Counsel  
Akke Levin (Bar No. 9102)  
Senior Deputy Attorney General  
*Attorneys for Defendants*

By: /s/ Nicole M. Harvey

Nicole M. Harvey (Bar No. 11147)  
4894 Sparks Boulevard  
Sparks, Nevada 89436  
*Attorney for Plaintiff*

10           **ORDER**

11           IT IS SO ORDERED.

12           DATED this 14th day of April, 2022.

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14           \_\_\_\_\_  
15           DISTRICT COURT JUDGE  
16           UNITED STATES MAGISTRATE JUDGE